

Jue, Tyrone

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**From:** Spanjian, Laura  
**Sent:** Thursday, March 04, 2010 7:27 PM  
**To:** blumenfeld.jared@epa.gov  
**Cc:** Harrington, Ed; Jue, Tyrone  
**Subject:** EPA comments regarding biosolids compost  
**Attachments:** 2003-12-24 EPA Denial of Petition to Ban LandApplication.pdf

Hi Jared:

Hope you're well.

Wanted to alert you to a CBS5 news report last night regarding our biosolids compost, and a quote from an EPA representative.

**CBS5 News (VID), 3/4/10 Concern Over SF 'Compost' Made From Sewage Sludge Reporting**  
**<http://cbs5.com/investigates/compost.sewage.sludge.2.1535936.html>**

Hugh Kaufman, a senior policy analyst for the EPA (we think he works in DC), is quoted as saying that biosolids compost is toxic.

It has been EPA's official policy since the promulgation of the Part 503 rule in the early 90s that biosolids should be beneficially reused.

In addition, I have attached a 2003 letter that was a response to an earlier petition from the Center for Food Safety to stop land application. If you read page 17, it states, "EPA maintains that the land application of sewage sludge in compliance with EPA's regulations is an appropriate choice for communities."

There is also a National Academy of Sciences 2002 Report that sites EPA's support for the beneficial use of biosolids (*Biosolids Applied to Land: Advancing Standards and Practices*):

"EPA has had a long-standing policy of promoting the beneficial use of biosolids, and a regulatory mandate to review and revise related regulations periodically as new research warrants. In January 1981, EPA published a statement of federal policy and guidance with the U.S. Food and Drug Administration (FDA) and the U.S. Department of Agriculture (USDA) for the proper management and necessary controls of land application of biosolids for the production of fruits and vegetables. EPA (1984) further formalized its policy of promoting beneficial use and developing a comprehensive regulatory approach as mandated by the CWA in the *Federal Register* on June 12, 1984. EPA again clarified that position through the publication of an interagency policy, which with six other federal agencies promoted the beneficial use of biosolids in the *Federal Register* on July 18, 1991 (EPA, USDA, U.S. Department of Defense, U.S. Department of Energy, U.S. Department of the Interior, FDA, and the Tennessee Valley Authority, 1991)."

This is a long way of asking if we can discuss with you ways to counteract the comments made by Mr. Kaufman in the news report. I understand that Mr. Kaufman has a colorful history in the press and seems to often label everything as toxic, but most people reading or listening to the report last night will not know that.

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We can discuss when you have time. Much appreciated.

Laura

**Laura Spanjian**  
*Assistant General Manager  
External Affairs  
San Francisco Public Utilities Commission  
1155 Market Street, 11th Floor  
San Francisco, CA 94103  
(415) 554-1540 direct  
(415) 554-3424 fax  
[lspanjian@sfwater.org](mailto:lspanjian@sfwater.org)*



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